REMARKS

Claims 1-38 are pending.

Claims 1-38 stand rejected.

Claims 1-2, 4-9, 18-19, 23-25 and 27-31 are amended.

Claims 3, 17, 26 and 35 have been cancelled.

Claims 1-2, 4-16, 18-25, 27-34 and 36-38 are hereby presented for reconsideration.

In the Office Action, the Examiner has rejected claims 2-3 under 35 U.S.C. § 112 as containing new matter. Claim 2 has been amended and claim 3 has been cancelled. Support for amended claim 2 is found in paragraph [0071] of the present application.

Turning to the first prior art rejection, the Examiner has rejected independent claims 1 and 24 under 35 U.S.C. § 103(a) as being unpatentable over Shtivelman (U.S. Patent Publication No. 2002/0054670) in view of Eng (U.S. Patent No. 6,195,359) and Ahmed (U.S. Patent No. 6,813,634). Applicants respectfully disagree with the Examiner's contentions and submit the

following remarks in response.

Independent claim 1 is directed to a call routing system for use in a directory assistance system having a primary call routing device at a first call center configured to receive directory assistance calls from callers and to determine, for each of the calls, whether the calls will be handled by the first call center or by a second call center in the directory assistance system among a plurality of call centers.

A secondary router at the first call center in the directory assistance system is configured to initially route the calls within the first call center to the primary call routing device, and if the primary call routing device is off-line, the secondary call router employs a default call distribution logic to route the calls among the first call center and the plurality of call centers in the directory assistance systems.

Applicants begin by noting that that the claims have been clarified to note that the claimed call routing is for a directory assistance system between a first call center 2 and any one of a plurality of second call centers 2'. See for example, paragraph [0018] of the present application to support this clarification.

The arrangement of claim 1 provides an advantage over prior art call routing arrangements within a directory assistance system by employing redundant call distribution. See paragraph [0005]. The primary call routing device 34 is used to distribute calls between the initially receiving first call center 2 and a second remotely located call center 2' See paragraph

[0027] and Figure 2. In the event that the primary call routers 34 are offline, the secondary call router 30, located at the same first call center 2 employs a default call distribution logic to ensure continued load balancing call routing between the plurality of second call centers 2'. See paragraph [0073] and Figure 4.

The cited Shtivelman reference is directed to an emergency call distribution system where incoming calls 19 from the PSTN 11 *are routed to a first call center through processor 29* to either a first emergency call center 13 or a second emergency call center 15. In paragraph 8 of the Office Action, the Examiner has likened elements 51 and 47 of call center 15 to the primary call routing device of the present invention. Such a comparison is in error. These elements are within call centers (call center 15) themselves and *do not make any decisions for routing a call (either to the same call center or to a different call center)* Rather, these elements may route calls to telephones within the system (such as phones 77 and 79) and provide CTI enhancements. See paragraph [0026] to [0028].

In Shtivelman, there is no routing from one call center 13 to the other call center 15, either by primary routing or secondary routing. In fact, the examples given are that call centers are emergency centers which would not route call between each other for load balancing as the features of each center may be unique. Rather, according to Shtivelman, once a call is slated for distribution to a particular call center it is either delivered or queued if there are no available operators. See paragraph [0037]. If the call is very urgent, the queued call may enter an IVR

code to move out of the queue. See paragraph [0038].

The Examiner goes on to state that element 29 of Shtivelman is similar to the secondary call router of the present invention. In view of the above discussion, such a comparison is again in error. Elements 29 and 31 of Shtivelman are the only router that makes any selection as to which call center a call will be routed to, but it is not located within a call center. Moreover, it does not "make a decision" in the sense of the claims, In Shtivelman element 29/31 routes a call to either call center 13 or 15 based on some set criteria (ie. to which emergency center a call should be routed based on the call). This is not a decision at all, but it is simply a preset routing decision. Elements 29/31 are more akin to monitors that measure call volume to threshold volume for calls it is sending to each call center to decide whether or not to queue the call.

The Examiner further cites to the Eng reference to support the idea that a secondary router may act as a slave "backup" when the primary router is off-line. The Eng reference is directed to an internet access arrangement that employs a "primary" router and a "secondary" router to allow different users on-line access. However, the routers in Eng are not in a primary/back-up relationship. Although the terms "primary" and "secondary" are used, the purpose is to provide different routing systems based on whether or not a user is using a faster newer modem (primary) or slower legacy modems (secondary). See for example, See column 2, lines 24-26 and column 4, lines 30-31 of Eng. It is noted that the Examiner has also cited to Ahmed to complete the rejection, but this reference was only cited to show a network fault

detection system.

As such, Applicants respectfully submit that the cited prior art, either alone or in combination with one another, does not teach or suggest all of the elements of independent claims 1 and 24. For example, there is no teaching or suggestion in any one of Shtivelman, Eng or Ahmed that discloses a secondary router at the first call center for initially routing calls within the first call center to the primary call routing device, and where if the primary call routing device is off-line, the secondary call router employs a default call distribution logic to route the calls among the first call center and the plurality of call centers in the directory assistance systems.

For at least this reason, Applicants respectfully request that the rejection of independent claims 1 and 24 be withdrawn. Also, as claims 2, 3-8, 25 and 17-30 depend therefrom respectively, these claims should be allowed for at least the same reasons.

Separately, the Examiner has rejected independent claims 9 and 31 under 35 U.S.C. § 103(a) as being unpatentable over Shtivelman in view of Foldare et al. (U.S. Patent No. 5,978,671). Applicants respectfully disagree with the Examiner's contentions and submit the following remarks in response.

Independent claim 9 is directed to a call routing system for use in a directory assistance system having a primary call routing device configured to receive directory assistance calls from callers and a frequent caller database, configured to store information corresponding to frequent callers.

A frequent caller routing module is coupled to the primary call routing device and is configured to determine if a particular caller's information is stored in the frequent caller database where if the caller's information is stored in the frequent caller database, the primary call routing device utilizes the information and determines if the caller is to receive priority call routing where the frequent caller routing module attempts to designate a desired predefined percentage of calls of the total numbers of calls to the directory assistance system as priority calls.

Such an arrangement provides for priority routing of calls, such as routing to more experienced call handling agents and shorter wait times for better customers. For example, as noted in paragraph [0035] of the present application, this allows the system to set a percentage of calls out of the total calls received that are treated in a priority manner in order to improve service to those customers.

To form the rejection, the Examiner has cited the Shtivelman reference in combination with Foldare (U.S. Patent No. 5,978,671). The comments as stated above regarding Shtivelman are applicable to claims 9 and 31 as well.

Moreover, the Foldare reference discloses a method for allowing frequent callers to update a database in a communication system which advantageously allows users to store certain alphanumeric codes for certain desired parties so that when they page them, they do not have to re-enter the alphanumeric codes every time they use the service. See for example, column 2,

lines 11-14 and column 2, lines 30-39.

As such, Applicants respectfully submit that the cited prior art, either alone or in combination with one another, does not teach or suggest all of the elements of independent claims 9 and 31. For example, there is no teaching or suggestion in any one of Shtivelman or Foldare that discloses a frequent caller routing module for determining if a particular caller's information is stored in the frequent caller database where if the caller's information is stored in the frequent caller database, the primary call routing device utilizes the information and determines if the caller is to receive priority call routing *where the frequent caller routing module attempts to designate a desired predefined percentage of calls of the total numbers of calls to the directory assistance system as priority calls.*

For at least this reason, Applicants respectfully request that the rejection of independent claims 9 and 31 be withdrawn. Also, as claims 10-16, 18-22, 32-34 and 36-38 depend therefrom respectively, these claims should be allowed for at least the same reasons.

Applicants note that independent claim 23 includes at least the above described features of claims 1 and 9 and should be deemed allowable for at least the same reasons set forth above in support of those claims.

In view of the foregoing Applicants respectfully submit that pending claims 1-2, 4-16, 18-25, 27-34 and 36-3 are in condition for allowance, the earliest possible notice of which is earnestly solicited. If the Examiner feels that an interview would facilitate the prosecution of this

Application, they are invited to contact the undersigned at the number listed below.

Respectfully submitted,

SOFER & HAROUN, L.L.P.

By_____

Joseph Sofer
Reg. No 34,438
317 Madison Avenue
Suite 910
New York, NY 10017
(212) 697-2800
Customer Number 39600

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